

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

RQ-3

November 30, 1995

Michael R. Robinson, Treasurer Elections Committee of the County of Orange 1700 East Garry, Suite 108 Santa Ana, CA 92705

Identification Number: C00192302

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Robinson:

This letter is to inform you that as of November 29, 1995, the Commission has not received your response to our request for additional information, dated November 8, 1995. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

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Dear Mr. Robinson:

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This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to non-profit organizations should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR \$106.5(b)(2), (d)(1), (d)(2) and 11 CFR \$\$104.10(b)(1)(ii)(B) and 106.6(c)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. Il CFR \$\$106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category, not by individual purpose such as "Utilities" or "Rent". Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

-Please amend your report by providing the full date for each disbursement itemized on Schedule H4 supporting Line 21(a).

-Please clarify all expenditures made for advertisement, advert. or advertising on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or E supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR \$104.3(b)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Pederal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans

Reports Analyst

Reports Analysis Division

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